

**IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF SOUTH CAROLINA  
SPARTANBURG DIVISION**

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<b>Kelly Dawsey,</b>	)	
	)	<b>7:22-03738-TMC-KFM</b>
<b>Plaintiff,</b>	)	
<b>v.</b>	)	
	)	<b>Plaintiff's ID of Expert Witness</b>
<b>Bayerische Motoren Werke</b>	)	
<b>Aktiengesellschaft and BMW</b>	)	
<b>Manufacturing Co., LLC collectively</b>	)	
<b>d/b/a "BMW Group",</b>	)	
	)	
<b>Defendants.</b>	)	

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Pursuant to paragraph 5 of DE 39, Plaintiff discloses as follows:

Name, address and telephone number of expert witness:

John E. Gibson, Jr., CPA/ABV, CVA  
Elliott Davis  
355 South Main Street, Greenville, SC  
864.370.5617

I have provided a copy of a written report containing the information required by Rule 26(a)(2)(B). [Dawsey 2843-72]. The report is preliminary based on information known at the time of issuance. Plaintiff will provide an updated report prior to any deposition of Mr. Gibson and will also update the numbers when a trial date is determined.

Respectfully submitted this 19<sup>th</sup> day of May 2023.

s/ Brian P. Murphy  
Brian P. Murphy  
Attorney for Plaintiff

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